

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

VASEK POSPISIL, NICHOLAS KYRGIOS,
ANASTASIA RODIONOVA, NICOLE
MELICHAR-MARTINEZ, SAISAI ZHENG,
SORANA CÎRSTEA, JOHN-PATRICK
SMITH, NOAH RUBIN, ALDILA SUTJIADI,
VARVARA GRACHEVA, TENNYS
SANDGREN, and REILLY OPELKA, on
behalf of themselves and all others similarly
situated,

-and-

THE PROFESSIONAL TENNIS PLAYERS
ASSOCIATION,

Plaintiffs,

v.

ATP TOUR, INC., WTA TOUR, INC.,
INTERNATIONAL TENNIS FEDERATION
LTD., and INTERNATIONAL TENNIS
INTEGRITY AGENCY LTD.,

Defendants.

Case No. 1:24-cv-00207-MMG

ORAL ARGUMENT REQUESTED

**DECLARATION OF BRADLEY I. RUSKIN IN SUPPORT OF ATP TOUR, INC.'S
MOTION TO DISMISS, OR, IN THE ALTERNATIVE, TO SEVER CLAIMS AGAINST
ATP UNDER F.R.C.P. 21, AND TRANSFER PURSUANT TO 28 U.S.C. § 1404(A)**

I, Bradley I. Ruskin, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1) I am an attorney at law admitted to practice in the State of New York and before this Court. I am a partner with the law firm Proskauer Rose LLP, counsel for defendant ATP Tour, Inc. in this case. I submit this declaration in support of Defendant ATP Tour, Inc.'s Motion to Dismiss, Or, In the Alternative, To Sever Claims Against ATP Under F.R.C.P. 21, and Transfer Pursuant to § 28 U.S.C. 1404(A).

2) Attached as Exhibit A is a true and correct copy of the Second Amended and Restated Bylaws of ATP Tour, Inc. as of January 1, 2023.

3) Attached as Exhibit B is a true and correct copy of the Sixth Amended and Restated Bylaws of ATP Tour, Inc. as of September 24, 2024.

4) Attached as Exhibit C is a true and correct copy of excerpts of the 2025 ATP Official Rulebook.

5) Attached as Exhibit D is a true and correct copy of the Eighth Amended and Restated Certificate of Incorporation of ATP Tour, Inc. filed October 1, 2024.

Dated: May 20, 2025

New York, New York

/s/ Bradley I. Ruskin
Bradley I. Ruskin